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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MERIDIAN SPORTS CLUB FULLERTON,
LLC, a California limited liability company,

Plaintiff,

v.

SCOTTSDALE INDEMNITY COMPANY,
an Ohio Corporation, and DOES 1-100,

Defendant.

Case No. 4:14-cv-02661-HSG

STIPULATION AND ~~PROPOSED~~ ORDER TO
CONTINUE DEADLINE FOR HEARING ON
DISPOSITIVE MOTIONS

Judge: Hon. Haywood S. Gilliam, Jr.

Complaint Filed:	May 1, 2014
Discovery Cut-Off:	May 29, 2015
Dispositive Motions To Be Heard By:	March 31, 2015
Trial Date:	August 24, 2015

Pursuant to Local Rule 6-2, Plaintiff Meridian Sports Club Fullerton, LLC ("Meridian") and Defendant Scottsdale Indemnity Company ("Scottsdale"), by and through their respective counsel of record, hereby stipulate as follows:

RECITALS

1. On October 30, 2014, Judge Yvonne Gonzalez Rogers issued a Case Management and Pretrial Order (Docket No. 22) that sets forth trial and pretrial dates in this instant matter ("CMC/Pretrial Order"). Pursuant to the CMC/Pretrial Order, the last day for dispositive motions to be heard is March 31, 2015, and the last day to file dispositive motions is February 24, 2015.

2. On February 13, 2015, this action was reassigned to Honorable Judge Haywood S. Gilliam, Jr. Pursuant to the Court's February 13, 2015 Order Reassigning Case, all "discovery cutoff dates and other deadlines associated with this case, such as disclosure and expert deadlines, shall remain in effect....All briefing schedule dates for motions and other proceedings will remain in place." (See In the Matter of the Reassignment of Civil Cases to the Honorable Haywood S. Gilliam, Jr., "Order Reassigning Case," filed on February 13, 2015, at ¶¶ 5-6.)

3. The current deadline for dispositive motions to be heard is Tuesday, March 31, 2015.

4. Pursuant to Judge Gilliam's calendaring schedule, law and motions are heard on Thursdays at 2:00 p.m. The first Thursday prior to the current March 31, 2015 deadline is March 26, 2015. In order for the parties to file dispositive motions with sufficient notice pursuant to Local Rule 7-2 (not less than 35 days after filing the motion), the last day to file dispositive motions would be February 19, 2015 for a noticed hearing date of March 26, 2015.

5. In light of the judicial reassignment and Judge Gilliam's calendaring schedule, the Parties herein respectfully request the Court to continue the March 31, 2015 deadline for dispositive motions to be heard to April 2, 2015, or as soon thereafter as the matter may be heard by the Court. Based on the requested deadline of April 2, 2015 as the last day for dispositive motions to be heard, the Parties further request the Court continue the deadline to file dispositive motions to February 26, 2015.

STIPULATION

IT IS SO STIPULATED between Defendant Scottsdale, on the one hand, and Plaintiff Meridian, on the other, by and through their undersigned attorneys, that the last day for dispositive motions to be heard is April 2, 2015 or as soon thereafter as the matter may be heard.

IT IS FURTHER STIPULATED that the last day for dispositive motions to be filed is February 26, 2015.

1 DATED: February 17, 2015

SELMAN BREITMAN LLP

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4 By: /s/ Quyen Thi Le
5 LINDA WENDELL HSU
6 MARK E. INBODY
7 QUYEN THI LE
8 Attorneys for Defendant Scottsdale Indemnity
9 Company

10 DATED: February 17, 2015

DONAHUE FITZGERALD LLP

11 By: /s/ Jason Flom
12 WILLIAM R. HILL
13 JASON FLOM
14 Attorneys for Plaintiff Meridian Sports Club
15 Fullerton, LLC
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ORDER

The Court has reviewed the parties' agreement and adopts the stipulation. Dispositive Motions in this matter shall be heard by April 2, 2015, or as soon thereafter as the matter may be heard. The last day to file dispositive motions is February 26, 2015.

IT IS SO ORDERED.

Dated: February 18, 2015



Hon. Haywood S. Gilliam, Jr.
District Judge of the United States District
Court, Northern District of California.

Selman Breitman LLP
ATTORNEYS AT LAW